

George Rountree, Jr.

(1904-1979)

Ryan F. Tennant

(1973-2016)

George Rountree, III*

Special Counsel

Geoffrey A. Losee

Stephen D. Coggins

Andrew R. Jones

Jason R. Harris**

Diane K. Pappayliou

Anna Richardson Smith***

Of Counsel



Street Address

2419 Market Street
Wilmington, NC 28403

Mailing Address

P.O. Box 1409
Wilmington, NC 28402

Phone

910.763.3404

Fax

910.763.0080

910.763.0320

11/18/2016

Regional Freedom of Information Officer
U.S. EPA, Region 4
AFC Bldg, 61 Forsyth Street, S.W., 9th Flr (4PM/IF)
Atlanta, GA 30303-8960

Incident Date: November, 2015
Our Client: Precision Marine Power, Inc.
Civil Action: Conti Enterprises, Inc. -v- ABC Corp (d/b/a Powell
Brothers Maintenance) et al.; Case No: 4:16 – CV- 00234
Our File No.: 1587.002

To Whom It May Concern:

We represent Precision Marine Power, Inc. in the above referenced action. We understand fuel was released from the Tug Iron Eagle in November, 2015.

By this letter, and pursuant to the Freedom of Information Act ("FOIA"), 5 U.S.C. 552, and as otherwise allowed by law, please produce the following: any and all information, including your case folder, documents, notes, correspondence, damage assessments, incident reports, witness accounts, affidavits, statements, summaries, materials, photographs, videos, audio, diagrams, drawings, opinions, warnings, citations, passenger list, and boarding reports, arising out of the investigation of this matter which are releasable under this Statute.

If there are any costs associated with this request, please bill them to our offices. If you have any questions, please do not hesitate to contact me.

Very truly yours,

Jason R. Harris

JRH/kn

cc: Precision Marine Power Inc. (Attn: George Reynolds) via email.
Travelers Ins. (Attn: Peter Walden) via email.

* also licensed in AZ ** also licensed in TX

*** licensed in VA NC license pending